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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Ray William Abelia ,
Plaintiff,
vs.
Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

} Case No. 2:23-cv-01224-AC

} STIPULATION AND ~~PROPOSED~~

} ORDER FOR EXTENSION OF

} TIME

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Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from November 27, 2023 to January 26, 2024, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs

1 being due on the same week. For the week of November 27, 2023 and December 4,
2 2023, Counsel has 10 merit briefs due and a settlement proposal due. Counsel
3 requires additional time to brief the issues thoroughly for the Court's
4 consideration. Defendant does not oppose the requested extension. Counsel
5 apologizes to the Defendant and Court for any inconvenience this may cause.

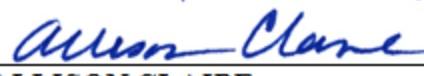
Respectfully submitted,

Dated: November 21, 2023 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

By: *s/ Oscar Gonzalez de Llano
Oscar Gonzalez de Llano
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on November 21, 2023)

1 **PROPOSED ORDER**
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3 Pursuant to stipulation, IT IS SO ORDERED.
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5 Dated: November 27, 2023

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7 ALLISON CLAIRE
8 UNITED STATES MAGISTRATE JUDGE
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